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20
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22
23 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

24 ZANE M. FLOYD,
25 Plaintiff,
26 v.

27 CHARLES DANIELS, Director, Nevada
28 Department of Corrections; HAROLD
29 WICKHAM, NDOC Deputy Director of
Operations, JOHN BORROWMAN,
30 NDOC Deputy Director of Support
31 Services; WILLIAM GITTERE, Warden,
32 Ely State Prison; WILLIAM REUBART,
33 Associate Warden at Ely State Prison;
34 DAVID DRUMMOND, Associate Warden
35 at Ely State Prison; IHSAN AZZAM, Chief
36 Medical Officer of the State of Nevada;
37 DR. MICHAEL MINEV, NDOC Director
38 of Medical Care, DR. DAVID GREEN,

39 Case No. _____
40 (To be Supplied by Clerk)

41 INDEX OF EXHIBITS TO
42 PLAINTIFF'S COMPLAINT FOR
43 INJUNCTIVE AND
44 DECLARATORY RELIEF DUE TO
45 PROPOSED METHOD OF
46 EXECUTION PURSUANT TO
47 42 U.S.C. § 1983

48 (DEATH PENALTY CASE)

49 EXECUTION WARRANT SOUGHT
50 BY THE STATE FOR THE WEEK
51 OF JUNE 7, 2021

1 NDOC Director of Mental Health Care,
 2 LINDA FOX, NDOC Director of
 3 Pharmacy; JOHN DOES I-XV, NDOC
 4 execution team members,

Defendants.

5 **EXHIBIT**

DOCUMENT

6 Exhibit 1 William Wan, *Execution drugs are scarce. Here's how one*
doctor decided to go with opioids, WASH. POST, Dec. 11, 2017

7 Exhibit 2 *State v. Dozier*, District Court of Clark County, Nevada, Case
 8 No. C215039, Recorder's Transcript of Evidentiary Hearing of
 Chief Medical, Nov. 3, 2017

9 Exhibit 3 Declaration of Dr. David B. Waisel, Oct. 4, 2017

10 Exhibit 4 *State v. Dozier*, District Court of Clark County, Nevada, Case
 11 No. 05C215039, Recorder's Transcript Re: Defendant's Motion
 12 for Leave to Conduct Discovery/Defendant's Motion for
 Determination Whether Scott Dozier's execution Will Proceed
 in a Lawful Manner/Status Check: Protocols, Oct. 11, 2017

13 Exhibit 5 Nevada Department of Corrections Execution Manual 2018

14 Exhibit 6 Declaration of Dr. John DiMuro, Oct. 20, 2017

15 Exhibit 7 *State v. Dozier*, District Court of Clark County, Nevada, Case
 16 No. C215039, Findings of Fact and Conclusions of Law, Nov.
 27, 2017

17 Exhibit 8 Declaration of Dr. David B. Waisel, Nov. 6, 2017

18 Exhibit 9 *Glossip v. Chandler, et al.*, W.D.Ok., Case No. Civ-14-66-F,
 19 July 6, 2020, ECF No. 325 at 19

20 Exhibit 10 *In re Ohio Execution Protocol Litigation*, No. 2:11-cv-1016
 (S.D. Ohio), Expert Report of Dr. James Williams, July 10,
 2019, ECF No. 2261

21 Exhibit 11 Declaration of Dr. David J. Greenblatt, March 5, 2021

22 Exhibit 12 Declaration of Dr. Craig W. Stevens, January 14, 2021

1 Dated this 16th day of April, 2021.

2
3 Respectfully submitted
4 RENE L. VALLADARES
Federal Public Defender

5 */s/ David Anthony*
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6 Assistant Federal Public Defender

7 */s/ Brad D. Levenson*
8 BRAD D. LEVENSON
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9 */s/ Timothy R. Payne*
10 TIMOTHY R. PAYNE
11 Assistant Federal Public Defender

CERTIFICATE OF SERVICE

In accordance with LR IC 4-1(c) of the Local Rules of Practice, the undersigned hereby certifies that on the 16th day of April, 2021, a true and correct copy of the foregoing INDEX OF EXHIBITS TO PLAINTIFF'S COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF DUE TO PROPOSED METHOD OF EXECUTION PURSUANT TO 42 U.S.C. § 1983 was filed electronically with the CM/ECF electronic filing system and was sent via email, addressed to counsel as follows:

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/s/ *Sara Jelinek*

An Employee of the Federal Public
Defenders Office, District of Nevada